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as an individual and on behalf of all others similarly situated

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

JELANI J. JENNINGS, an individual,  
and on behalf of all others similarly  
situated

Plaintiff,

v.

NORTHROP GRUMMAN  
CORPORATION, a Delaware  
Corporation; GARY STANKOVICH,  
an individual; and DOES 1 through 100,  
inclusive,

Defendants.

CASE NO.: 2:24-cv-7212-FMO-E

*[Assigned to the Hon. Fernando M.  
Olguin]*

**JOINT STIPULATION TO  
EXTEND DISCOVERY CUTOFF  
AND ASSOCIATED DATES**

Complaint Filed: June 26, 2024

Removal Filed: August 23, 2024

Fact Cutoff: April 4, 2025

Trial Date: None Set

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

2 Consistent with the Scheduling Order set forth on October 4, 2024, Plaintiff  
3 JELANI J. JENNINGS (“Plaintiff”) along with Defendants NORTHROP  
4 GRUMMAN CORPORATION and GARY STANKOVICH (together “Defendants”)  
5 submit this Joint Stipulation to Extend the Discovery Cutoff and all associated dates  
6 therewith.

7 WHEREAS, on October 4, 2024, this Court issued a Scheduling Order setting  
8 forth a discovery timeline of approximately six months from October 2024 through  
9 April 4, 2025;

10 WHEREAS, on February 6, 2025, Defendants filed a Motion to Compel  
11 Arbitration in which they argued that Plaintiff’s claims are subject to bilateral  
12 arbitration, and that motion was set to be heard on March 6, 2025;

13 WHEREAS, the Motion to Compel Arbitration was subsequently taken under  
14 submission for decision on the papers as of February 28, 2025, and the decision still  
15 remains pending;

16 WHEREAS, Plaintiff has served discovery, Defendants objected to that  
17 discovery, the parties have met and conferred about that discovery, and are at an  
18 impasse<sup>1</sup>;

19 WHEREAS, the current discovery cutoff is set for April 4, 2025, and the  
20 decision on the Motion to Compel Arbitration remains pending;

21 WHEREAS, in agreeing to this stipulation, Defendants do not consent to  
22 litigation in this forum and do not agree that any discovery or any corresponding  
23 deadlines in this forum are appropriate, and Defendants reserve all rights in that  
24 regard;

25

26

27 <sup>1</sup> See Plaintiff’s unilaterally submitted Declaration of Laurel N. Holmes in Support of the Joint Stipulation  
28 to Extend Discovery Cutoff and Associated Dates. Defendants reserve the right to file a declaration in  
response to Plaintiff’s declaration.

1        THEREFORE, the Parties jointly submit this stipulation to continue the April  
2 4, 2025, discovery cutoff, as outlined in the October 4, 2024, Scheduling Order, to  
3 180 days past the date this Court notifies the Parties of an Order on Defendants'  
4 Motion to Compel Arbitration, as well as continuing all other related deadlines as  
5 outlined in the Court's Scheduling Order;

6        THEREFORE, the Parties jointly submit this stipulation to continue all dates  
7 set forth in the October 4, 2024, Scheduling Order to 180 days past the date this Court  
8 notifies the Parties of an Order on Defendants' Motion to Compel Arbitration;

9        THEREFORE, the Parties jointly request that this court revise the October 4,  
10 2024, Scheduling order consistent with this Stipulation.

11  
12 Dated: April 3, 2025

BIBIYAN LAW GROUP, P.C.

13  
14  
15 BY: 

16 DAVID D. BIBIYAN

HENRY G. GLITZ

17 LAUREL N. HOLMES

18 Attorneys for Plaintiff, JELANI J. JENNINGS,  
19 as an individual and on behalf of all others  
20 similarly situated

21 Dated: April 3, 2025

Gibson, Dunn & Crutcher LLP

22  
23 BY: /s/ Virginia Baldwin

24 JESSE CRIPPS


25 VIRGINIA BALDWIN

26 Attorneys for Defendants NORTHROP  
27 GRUMMAN CORPORATION and GARY  
28 STANKOVICH

**SIGNATURE ATTESTATION**

In accordance with Central District of California Local Rule 5-4.3.4, I attest that the other signatory listed, Virginia Baldwin, on whose behalf this filing is submitted, concurs in the filing's content and has authorized the filing.

DATED: April 3, 2025

By:   
Laurel N. Holmes

**CERTIFICATE OF SERVICE**  
**JELANI J. JENNINGS, V. NORTHROP GRUMMAN**  
**CORPORATION, ET AL.**  
**2:24-cv-7212**  
**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1460 Westwood Boulevard, Los Angeles, California 90024

I certify that on April 3, 2025, I electronically filed the following document(s) described as **JOINT STIPULATION TO EXTEND DISCOVERY CUTOFF AND ASSOCIATED DATES**, and that they are available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system. Further, I certify that the foregoing documents were served by electronic transmission to the below referenced electronic e-mail address as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 3, 2025, at Los Angeles, California.

/s/ Laurel N. Holmes  
Laurel N. Holmes